

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

**MDL NO. 16-2738 (FLW) (LHG)  
JUDGE FREDA L. WOLFSON  
MAG. JUDGE LOIS H. GOODMAN**

*This document relates to: Tracey Crocoll,  
as Representative of the Estate of  
Catherine Crocoll v. JOHNSON &  
JOHNSON et al*

**Case No: 3:18-cv-11624**

**PLAINTIFF'S EX PARTE MOTION FOR ENTRY OF A HIPAA  
PROTECTIVE ORDER TO OBTAIN THE RELEASE OF MEDICAL RECORDS**

Plaintiff Tracey Crocoll, as representative of the Estate of Catherine Crocoll, Deceased, by and through her attorney, Sofia Bruera, and pursuant to Federal Rule of Civil Procedure 26(c), moves for entry of a HIPAA protective order permitting the disclosure of “protected health information” of her deceased mother, Catherine Crocoll, for the purpose of the above-captioned litigation.

WHEREFORE, Plaintiff, Tracey Crocoll, as surviving heir of the Estate of Catherine Crocoll, Deceased, requests that the court enter a HIPAA protective order authorizing the disclosure of Catherine Crocoll’s protected health information for the purposes of this products liability litigation as outlined in the proposed order.

Date: August 6, 2018

Respectfully submitted,

**PIERCE SKRABANEK PLLC**

/s/ Sofia E. Bruera

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 6, 2018, a copy of the foregoing NOTICE OF FILING was filed via the Court's CM/ECF electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Sofia E. Bruera

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SOFIA E. BRUERA

**PIERCE SKRABANEK PLLC**